

**AFFIDAVIT OF
PATRICE JORDAN ROBINSON**

IN THE CHANCERY COURT OF TENNESSEE
FOR THE THIRTIETH JUDICIAL DISTRICT AT MEMPHIS

PATRICE JORDAN ROBINSON,
GREATER MEMPHIS DEMOCRATIC CLUB,
LATANYA BARBER THOMAS, and
JOHNSON SAULSBERRY, III

Plaintiffs

VS.

Docket Number _____

SHELBY COUNTY ELECTION COMMISSION
LINDA PHILLIPS, in her official capacity as
Administrator of the Shelby County Election
Commission, STEVE STAMSON, ANTHONY TATE,
MATT PRICE, BENNIE SMITH, AND
BRENT TAYLOR, in their official capacities as
Members of the Board of Commissioners of the
Shelby County Election Commission,

Defendants.

AFFIDAVIT OF PATRICE JORDAN ROBINSON

1. My name is Patrice Jordan Robinson. I am a resident of Memphis, Shelby County, Tennessee. I currently serve on the City Council as the City Councilwoman for City of Memphis District 3, and I am a candidate for reelection during the October 3, 2019 City of Memphis Municipal Election.
2. I have also actively worked in other political office campaigns in various capacities since I became civically involved in the Memphis Community in or about the year 1999
3. This is the first year that I have ever known the Shelby County Election Commission to impose a written rule that mandates campaign workers to find somewhere else to use the restroom.

4. Based on my experience with my own political campaigns, I am aware that candidates for political office with fewer financial resources; candidates lacking the financial resources to invest heavily in purchasing political advertisements prior to election day and during early voting; and "grassroots" candidates heavily rely upon, as do I, the dissemination of campaign literature by campaign workers who are lawfully allowed to distribute campaign information outside 100 feet entrances of buildings where polling places are located.
5. Not allowing campaign workers to use the restroom will logically result in less time and missed opportunities for campaign workers to distribute my campaign materials to voters who come to cast their votes because the campaign worker is required under the Shelby County Election Commission's rule to leave the premises to go to the restroom.
6. Individuals who distribute campaign materials for me during this election period may work at the polling locations from 11:00 a.m. until 7:00 p.m., every weekday and from 10:00 a.m. until 4:00 p.m. on weekends during the early voting period, and 7:00 a.m. until 7:00 p.m. on Election Day.
7. Prior to working in my campaign, campaign and other poll workers are provided with written instructions and rules that comply with the Shelby County Election Commission's rules. (See Attachment A).
8. When a campaign worker has to enter a building where a polling place is located for the limited purpose of using the restroom, they are not working in the scope and course of their position as a campaign worker; they wear clothing that covers up any political messages before entering the building; they do not carry signs, bumper

stickers, posters, or any literature advocating for or against any candidate or issue and they do not engage in conversation with voters or interfere with the election process in any way.

9. I am aware that some of the campaign workers who work at polling locations are African-American citizens, who do not have transportation and it is difficult, and sometimes dangerous, for these campaign workers to leave the premises where the polling place is located and walk to another location to use the restroom.
10. The Shelby County Election Commission's rule that prohibits campaign workers from entering buildings where polling places are located to use restrooms will result in irreparable harm to candidates, such as myself, because I rely on campaign workers to communicate my platform and they will miss opportunities to educate voters on my platform and my candidacy during the time period lost while they leave to go to another location to use the restroom.

In witness whereof, I have hereunto subscribed my name on this 24 day of September, 2019.

Patrice J. Robinson
Patrice Jordan Robinson

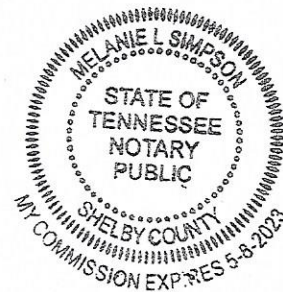
STATE OF TENNESSEE
COUNTY OF SHELBY

SWORN TO AND SUBSCRIBED BEFORE ME THIS 24 day of September, 2019.

Melanie L Simpson

Notary Public

My commission expires: 2023



POLL WATCHER ACTIVITY CHART

- Poll watchers may be appointed by each political party; each candidate in a general or primary election; any citizen's organization interested in a question on the ballot; and any citizen's organization interested in preserving the purity of elections and in guarding against abuse of the elective franchise;
- Poll watchers may be appointed at whatever location where voting occurs; and
- Poll watchers must be appointed no later than 12:00 noon two (2) business days before the day of voting.

PERMITTED ACTIVITIES	PROHIBITED ACTIVITIES
<ul style="list-style-type: none"> ✓ Watch and inspect performance in and around polling place ✓ Through judges, challenge voters ✓ During preparation and certification, inspect the poll lists ✓ Inspect the ballots while being called and counted ✓ During preparation and certification, inspect the tally sheets ✓ Present a protest of any aspect of the conduct of the election to the officer of elections, county election commission or inspector 	<ul style="list-style-type: none"> ✗ Interfere with any voter in preparing or casting voter's ballot ✗ Prevent election official from performing his or her duties ✗ Observe the giving assistance to a voter ✗ Wear campaign material of any kind during the performance of his or her duties ✗ Engage in any campaign activity within the 100' boundary ✗ Exit the room of the counting board after the actual counting of ballots begins ✗ Possess electronic devices when they are observing the duties of the absentee counting board. ✗ Photographs and videos are prohibited

Attachment A